



MOD056958796

Document

Date

[illegible]

T - Telephone Conversation  
R - Report  
NA - Newspaper Article

B-6  
102-1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VII  
KANSAS CITY, MISSOURI - 64101

MEMORANDUM:

Re: Preliminary Assessment of Silmasco Inc./Silvermat Service Co.  
St. Louis, Mo.

From: Steven Kinser

To: Gale Wright

This PA is part of Missouri's 3012 Grant work. The site is a former silver recovery operation. The building served as administrative offices and a portion was used to produce silver concentrate from waste photographic solutions. The process consisted of drying the solutions to produce a concentrate which was milled to a homogeneous consistency. The process involved only low heat and no harmful vol<sup>a</sup>atiles were reported. The recovery operation was terminated in 1984. The PA concludes that the listing of the site was in error and there is no evidence of an abandoned/uncontrolled hazardous waste site nor any evidence of any endangerment to human health ~~xxx~~ or the environment. I concur.

Gale A. Wright  
agree

\_\_\_\_\_  
disagree

\_\_\_\_\_  
comments

7-19-85

ABANDONED/UNCONTROLLED HAZARDOUS WASTE SITE INVESTIGATION  
PRELIMINARY ASSESSMENT REPORT

'3012' Grant Summary

**SUPERFUND**

Case #534.735

JUL 08 1985

**SITE LOG**

Silmasco Inc./Silvermat Service Co.  
132 Hanley Industrial Court  
St. Louis County, Missouri 63144

RECEIVED  
MAY 17 1985  
WASTE MANAGEMENT

- I. INVESTIGATOR: Mike Duvall  
Environmental Specialist  
Waste Management Unit  
St. Louis Regional Office (SLRO)  
Missouri Department of Natural Resources
- II. DATE INVESTIGATION INITIATED: February 8, 1985  
DATE INVESTIGATION COMPLETED: May 3, 1985
- III. BACKGROUND OF THE INVESTIGATION:

The Silvermat Service Company, formerly owned by Silmasco Inc., previously maintained a St. Louis area headquarters in the Hanley Industrial Court in Brentwood. This facility served as the general offices for the firm and was the site of the company's precious metal (silver) recovery operation.

Silvermat obtained certification from the Missouri Department of Natural Resources for resource recovery (RR) activity on September 30, 1982, and was issued license #H01109 from the Department as a transporter of hazardous waste to allow servicing of customers. Resource Recovery certification #RR-012 has since expired as the reclamation process was terminated by the company at the Brentwood facility.

Presumably the facility was placed on the ERRIS list based upon an erroneous notification of hazardous waste activity filed with the US EPA by Silvermat in September 1980. Included as a report attachment is a copy of the notification submitted under sect. 3010 of RCRA by Mr. Jos. Mathews, former company president, in which the category of treatment/storage/disposal was indicated with respect to the Brentwood operation.

Classification of the site as a treatment/storage/disposal facility (TSDF) was inappropriate, however, considering the nature of the waste material handled by Silvermat and its mode of operation. The company was engaged in the servicing of various clients for the removal of spent photographic fixer solutions and the recovery of marketable quantities of silver therefrom. Spent solutions were routinely obtained from customers such as medical offices and hauled in small containers to the Brentwood site for reclamation. Compostion of the material was typically gel or sludge-like. Upon receipt at the Silvermat facility, the spent solutions were subjected to a simple drying process in a low heat oven, followed by milling of the dried material to a homogeneous consistency. The

milled material was then assayed for purity and sold to refiners.

IV. IDENTITY OF PERSONS REFERENCED IN REPORT      ASSOCIATION  
CONTACT INFORMATION

Mr. Marvin Brimer      President  
Engravings Unlimited Inc.  
132 Hanley Industrial Court  
St. Louis County, Missouri 63144  
(314) 781-7878

Mr. Jeff Dalton      Sales & Marketing  
Silvermat Company      Manager  
10950 Lin-Valle Drive  
St. Louis County, Missouri 63123  
(314) 487-8774

Mr. Ron Darling      County Field Officer  
Waste Management Section  
St. Louis County Dept. of  
Community Health and Medical Care  
801 South Brentwood  
Clayton, Missouri 63105  
(314) 854-6927

V. BRIEF SUMMARY OF INFORMATION OBTAINED:

A site inspection and meeting were conducted to gather the information for this investigation. A telephone interview was also held with one of the principal parties involved. The existing agency file on the facility pertaining to resource recovery certification was reviewed to ascertain all relative background.

No evidence has been found indicative of abandoned/uncontrolled hazardous waste activity at the site of the former Silvermat facility in Brentwood. The property is currently owned and occupied by another business having no correlation with the predecessor operation.

Regulatory requirements applicable to the previous silver reclamation process have also been clarified since the time of the original notification of hazardous waste activity and certification by the state. At no time was the facility regulated under federal RCRA due to the exemption allowed by 40 CFR 261 for beneficial reuse or recycling. Present Missouri regulations recognize the recovery of precious metals and exempt such materials and processes from hazardous waste management requirements per 10 CSR 25-4.010.

VI. DETAILED RECOUNT OF INVESTIGATION:

Telephone contact was initially established with a representative of the Silvermat Company using information provided in the original resource recovery application. It was learned that Mr. Mathews had been replaced by Mr. Jeff Dalton, who answered at the revised telephone exchange and discussed the matter with the writer.

Mr. Dalton explained that Silvermat had been acquired by the Hauser and Miller Corp. on March 30, 1984 and had become one of its operating divisions. He further stated that silver recovery operations were terminated by September 1, 1984, with the Silvermat personnel vacating the premises shortly thereafter. The reclamation equipment was reportedly dismantled and removed along with all residual materials associated with the process. The property was subsequently transferred to another company known as Engravings Unlimited Inc.

Mr. Dalton went on to say that the Silvermat Division is now situated within the Hauser & Miller facility located in Lemay. The company is no longer engaged in the in-plant recovery of silver, but remains active in the overall reclamation market. Their scope of activities presently includes marketing and distribution of small-scale units designed for in-house application by customers such as hospitals and medical offices, which generate spent fixer solutions from developing X-ray film and related processes. Technical reference information provided by Mr. Dalton on the available types of units and operating methodologies is included as another attachment to this text.

Silvermat presently functions as a broker for the recovered silver flake collected from the various on-site units, in addition to distributing and servicing the units for customers. The company handles pick-up and hauling of the flake material for further processing or ultimate refining at other facilities operated by the parent corporation, Hauser & Miller. No processing activity takes place at the new divisional headquarters in Lemay. Subsequent to the telephone interview with Mr. Dalton, a confirmation letter was received in the St. Louis Regional Office dated February 2, 1985 and is included as an attachment.

A reconnaissance of the former Silvermat site in Brentwood was conducted on February 27, 1985 by Mr. Ron Darling of the St. Louis County Department of Community Health and Medical Care - Waste Management Section and the writer. The investigators met with Mr. Marvin Brimer, President of Engravings Unlimited, and proceeded to inspect the premises in his presence. Conference with Mr. Brimer substantiated the account previously provided by Mr. Dalton regarding the change in property ownership and occupation between Silvermat and Engravings Unlimited.

A tour of the building at 132 Hanley Industrial Court revealed that it is currently occupied by a custom engraving shop and a supporting office. Examination of the downstairs level of the two-story building confirmed that all equipment and appurtenances associated with the prior Silvermat operation had been removed. No traces of residual materials or wastes related to the silver recovery process were observed. Mr. Brimer mentioned that the downstairs area had been thoroughly cleaned and vacuumed to remove any remaining fine dust upon establishing the engraving shop in November 1984.

Likewise, surveillance of the building exterior and surrounding lot revealed no evidence of waste storage, disposal or residual

spillage. Site photos were obtained as additional documentation of the situation and are included as an attachment to this report.

VII. CONCLUSION AND RECOMMENDATIONS:

It is concluded that the original basis for listing of the Silmasco/Silvermat Services site in Brentwood on the ERRIS track was erroneous. The silver recovery process previously operated by Silvermat has been discontinued. There is no evidence of an abandoned/uncontrolled hazardous waste site(s) at the old Silvermat facility at 132 Hanley Industrial Court.

Further note is made of the fact that current state and federal hazardous waste management regulations exempt precious metal recovery processes such as that utilized by the defunct Silvermat operation. This is supported by 10 CSR 25-4.010(1)(E)(6).

In the judgement of the writer, no further action is warranted or necessary in this case. It is recommended that the site be removed from the federal ERRIS list.

VIII. SIGNATURES:

Prepared by:

*Mike Duvall*

Mike Duvall  
Chief, Waste Management Unit  
St. Louis Regional Office

5-13-85  
Date

Approved by:

*F. Donald Maddox*

F. Donald Maddox  
Regional Administrator  
St. Louis Office

5/13/85  
Date

IX. LIST OF ATTACHMENTS:

1. EPA form 2070-12
2. Letter of February 26, 1985 from J. Dalton to Mike Duvall
3. Silver reclamation technical brochure
4. RCRA section 3010 Notification of September 1980
5. RR-12 certification of September 30, 1982
6. County highway map with site location reference
7. Annotated site photo prints



# Potential Hazardous Waste Site

## Preliminary Assessment

ATTACHMENT #1

RECEIVED

MAY 17 1985

WASTE MANAGEMENT

SUPERFUND

JUL 08 1985

SITE LOG



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
MO D056958796

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) SILMASCO-INC. / SILVERMAT SERVICE CO.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 132 HANLEY INDUSTRIAL CT.	
03 CITY BRENTWOOD	04 STATE MO	05 ZIP CODE 63144	06 COUNTY ST. LOUIS
09 COORDINATES LATITUDE 38° 36' 58" 0		07 COUNTY CODE 189	
LONGITUDE 090° 20' 09" 0		08 CONG DIST 02	

10 DIRECTIONS TO SITE (Starting from nearest public road)

TAKE US 40 WEST FROM DOWNTOWN ST. LOUIS → EXIT SOUTH AT JUNCT. WITH LACLEDE STATION RD  
→ CONTINUE ~2 MI. ON LACLEDE STATION → EXIT RIGHT (WEST) INTO HANLEY INDUST. CT.  
→ FACILITY ON LEFT (SOUTH) AT 132 ADDRESS.

III. RESPONSIBLE PARTIES

01 OWNER (if known) ENGRAVINGS UNLTD. INC., M. BRIMER PRES.		02 STREET (Business, making, residential) AS ABOVE	
03 CITY AS ABOVE	04 STATE "	05 ZIP CODE "	06 TELEPHONE NUMBER (314) 781 7878
07 OPERATOR (if known and different from owner) SILVERMAT SERVICE CO.		08 STREET (Business, making, residential) 10950 LIN-VALE DR., ST. LOUIS CO. MO 63123	
09 CITY LEMAY	10 STATE MO	11 ZIP CODE 63123	12 TELEPHONE NUMBER (314) 487 8774
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN			

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: 09, 09, 80 MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: \_\_\_\_\_ MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE _____ MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input checked="" type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____	
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input checked="" type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR 1979 ENDING YEAR 1984 <input type="checkbox"/> UNKNOWN	

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

NONE

SUPERFUND

JUL 08 1985

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

NONE

SITE LOG

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)  
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspection on time available basis) ☒ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT MIKE DUVAL		02 OF (Agency Organization) AS BELOW		03 TELEPHONE NUMBER ✓	
04 PERSON RESPONSIBLE FOR ASSESSMENT AS ABOVE		05 AGENCY MDNR	06 ORGANIZATION DEQ-SCRO	07 TELEPHONE NUMBER (314) 849 1313	08 DATE 05, 03, 85 MONTH DAY YEAR





POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ B. SURFACE WATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ C. CONTAMINATION OF AIR  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ F. CONTAMINATION OF SOIL  
03 AREA POTENTIALLY AFFECTED: \_\_\_\_\_ (Acres) 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ G. DRINKING WATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ H. WORKER EXPOSURE/INJURY  
03 WORKERS POTENTIALLY AFFECTED: \_\_\_\_\_ 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ I. POPULATION EXPOSURE/INJURY  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA  
04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES  
(Spills/runoff/standing liquids/leaking drums)

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ N. DAMAGE TO OFFSITE PROPERTY  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references, e. g., state files, sample analysis, reports)

***Silvermat***

10950 Lin-Valle Drive  
St. Louis, Missouri 63123  
314-487-8774

RECEIVED

FEB 2 1985

SLRO  
MDJ

February 26, 1985

Mike Duval  
Missouri Dept. of  
Natural Resource  
8460 Watson Rd.  
St. Louis, Mo, 63119

Dear Mr. Duval:

This letter is to notify you that as of March 30, 1984, Silvermat Service Company was purchased by The Hauser & Miller Co. from it's past owners Silmasco Inc. Also as of September 1, 1984 Silvermat ceased silver recovery operations and moved from 132 Hanley Industrial Court. To the best of my knoweldge the Hanley location in now owned and occupied by Engravings Unlimited.

In regards to our past phone conversations breifly let me recap.

Silvermat is now located in the Hauser & Miller plant. Presantly we are not involved in any in-plant silver recovery ( removing silver from solutions, burning film ), however we would like to retain any waste hauling or processing permits we have had in the past.

If there are any steps we need to take to retain permits, or any further information we can provide for you please contact either myself or Tom Deimeke General Manager.

Best Regards,



Jeff Dalton  
Marketing Manager  
Silvermat Service Co.

JHD/jd



A division of the Hauser & Miller precious metals company.



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MOD056958796

Silmasco Inc DBA Silvermat Service Co.  
XXXX 132 Hanley Industrial Court  
St. Louis, MO 63144

INSTALLATION ADDRESS

132 Hanley Industrial Court  
St. Louis, MO 63144

ATTACH #4

4. If you generate, as a result of your operating processes, one or more of these listed wastes in excess of 100 kg per month but less than 1000 kg/month your facility is a generator by definition under the Missouri State Hazardous Waste Law and Regulations, but is defined as a "small quantity generator" under the Federal RCRA regulations.

5. If you notified us under RCRA because your hazardous waste was identified as "PCB's," you are regulated under the Toxic Substances Control Act (TSCA), and may be exempt from regulation under RCRA.

6. You should have checked block "D", Underground Injection, if an injection well is located at your facility. An injection well is defined as any man-made hole in the ground that is deeper than it is wide and that is used for the subsurface placement of fluid, including septic tanks that have the capacity to serve 20 or more people.

In order to correctly identify your facility's status within the program, it is very important that you consider the above points and respond to us in writing within 15 days of the date of receipt of this letter, providing us with the correct information. The letter should be signed by the person who signed the initial notification, or if that person is no longer employed by the facility, it should be signed by his or her successor and your letter should so state. If we do not hear from you within 15 days, it will be necessary to refer your file to our Compliance staff for additional follow-up.

If you have any questions about this process, please contact Ms. Betti Harris, Missouri Coordinator, who can be reached at 816-374-6534.

Thank you for your cooperation.

Sincerely yours,

Robert L. Morby  
Chief, Waste Management Branch  
Air and Waste Management Division

cc: David Bedan, Director  
Waste Management Program, MDNR

Enclosure

Mr. Joseph G. Matthews  
President  
Selmasco, Inc.  
132 Hanley Industrial Court  
St. Louis, Missouri 63144

RE: MOD056958796

Dear Mr. Matthews:

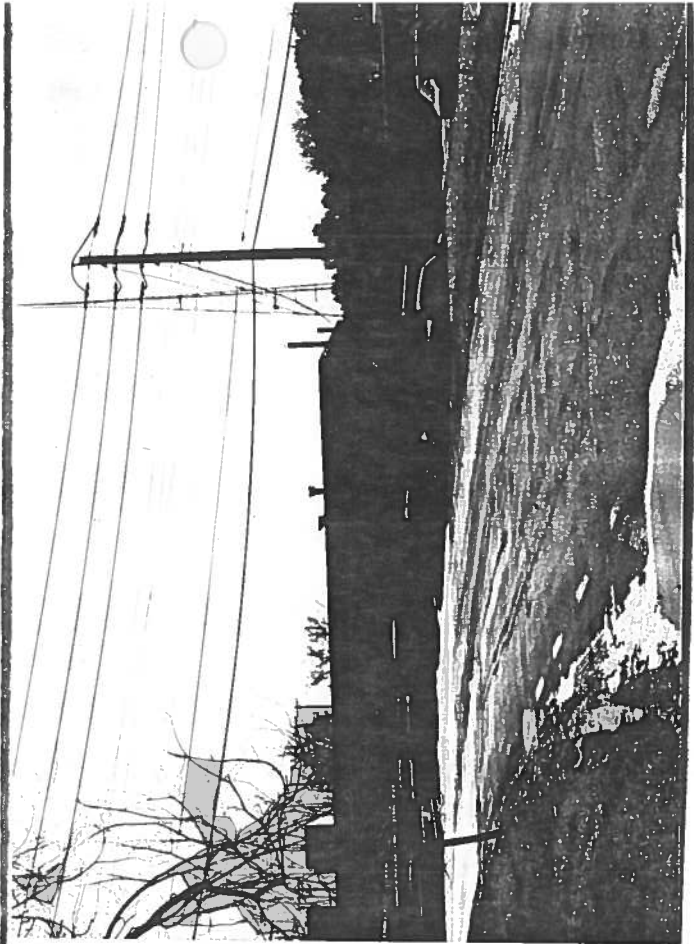
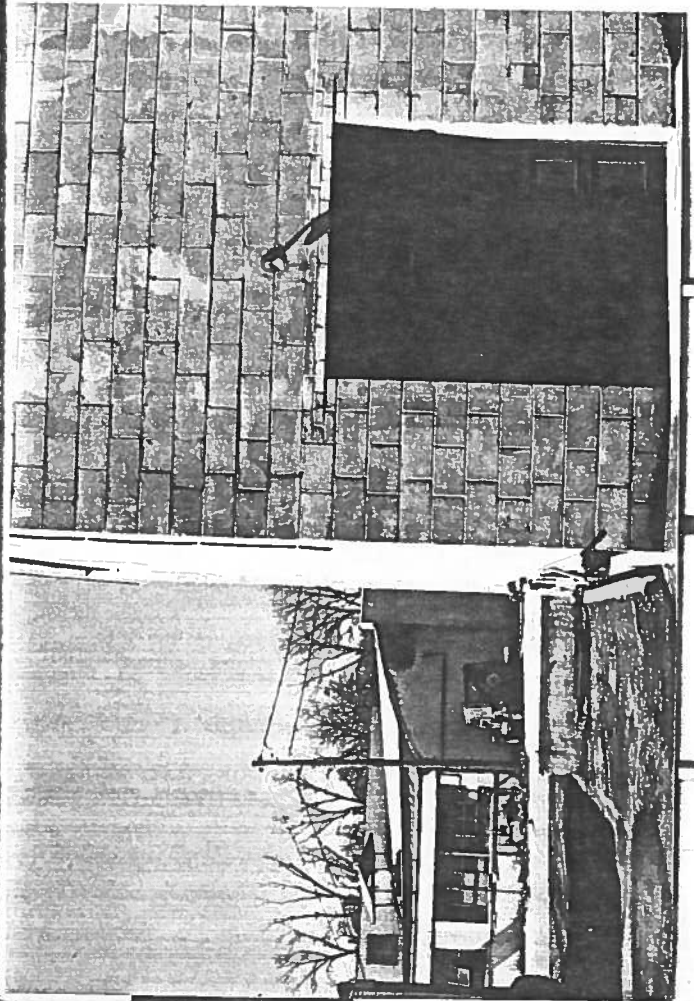
Our records show that in 1980, you submitted a Resource Conservation and Recovery Act (RCRA) notification for the above listed facility, and indicated that it was involved in the "treatment, storage and disposal" (TSD) of a hazardous waste as defined in 40 CFR Parts 260-265. However, you did not elect to complete your request for Interim Status under the Act by following that notification with the submittal of a Part A Permit Application. It is no longer possible to receive Interim Status except under selected conditions, according to the RCRA regulations, but as a "TSD" facility, you may be subject to the full RCRA permitting regulations unless you advise us to the contrary.

Many persons completed this notification form incorrectly, so for purposes of clarification, you should consider the following in determining your correct status under the regulations:

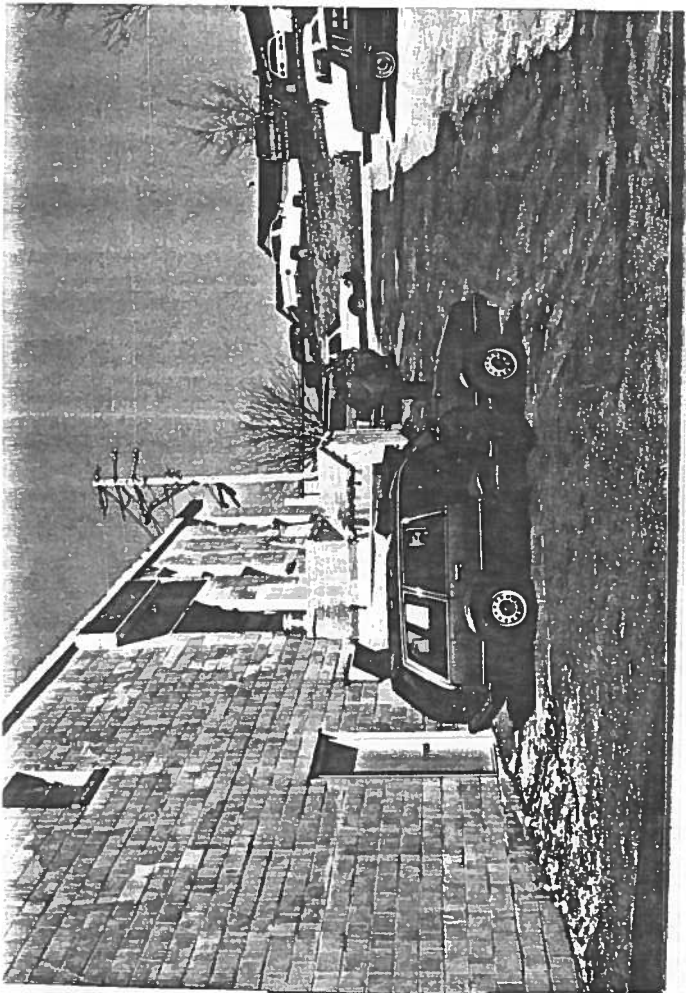
1. If you treat on site, store on site longer than 90 days, or dispose on site any of the hazardous wastes listed in 40 CFR Part 261, your facility is probably correctly identified as a TSD.
2. If you generate, as a result of your operating processes, one or more of these listed wastes in excess of 1000 kg per month (2200 lbs) or 1 kg per month (2.2 lbs) of an acute hazardous waste as listed, and if you do not store these wastes for longer than 90 days, then your facility is probably correctly identified as a generator.
3. If your facility is engaged in the transportation of any of these hazardous wastes in the course of your operating processes, then it is probably correctly identified as a transporter. If the material is transported from your facility by another firm, then your facility is not a transporter.

BB

RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO: Joe Rowe		FROM: Alice Furst	DATE
			TIME
SUBJECT			
SUMMARY OF COMMUNICATION			
<p>Transmitted copy of File to MDNR on 10-25-84</p> <p>Silmasco Inc, Silvermat Service MOD05695 8796</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES			
TO:			



ATTACH. # 7





The material, classified as hazardous waste, is received from generators in the form of a medium (40% pure) to high (98% pure) grade silver ore. The material ranges from semi-metallic to a mud cake. Both contain moisture. Once the material enters the Silvermat plant, it is logged in, a sample is taken of each customer's material and then dried in a low heat, high volume oven. Once the moisture has been removed, it is milled to a homogeneous consistency. The lot is then assayed for purity and shipped in a sealed container to a refiner for sale.

5. List all types of hazardous wastes to be used, reused, recovered or reclaimed at the facility.

	Listed Hazardous Waste	Estimated Quantity Per Month	Units (Gals., lbs., tn., etc.)
1	Silver bearing material (semi-metallic) extracted from photographic fixer solution	10,000	Troy Ounces
2			
3			
4			
5			
6			
7			
8			
9			
10			

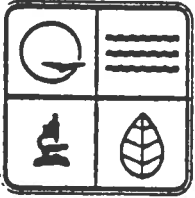
6. On a separate page describe the storage, and resource recovery process for each waste listed above.
7. As required by 10 CSR 25-9.010, attach the following information.
- |                           |   |
|---------------------------|---|
| 10 CSR 25-9.010(1)(C)2.A. | Flowsheet through resource recovery process |
| 10 CSR 25-9.010(1)(C)2.B. | Quality control plan                        |
| 10 CSR 25-9.010(1)(C)2.C. | Facility drawings                           |
8. Has this facility obtained interim status or a permit from the U.S. Environmental Protection Agency? Yes

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
Waste Management Program  
P.O. Box 1368  
Jefferson City, Missouri 65102

OFFICE USE ONLY

FACILITY I.D. NO.

Date Application Approved   /  /  



**CERTIFIED**  
**RESOURCE RECOVERY FACILITY**  
**APPLICATION FORM**

1. Name of Applicant SILMASCO, INC. d/b/a SILVERMAT SERVICE COMPANY  
Address 132 Hanley Industrial Court Phone (314) 645-5575  
City St. Louis, State Missouri Zip Code 63144

2. Name of Facility SAME AS ABOVE  
Street Address \_\_\_\_\_  
Location of Facility: Nearest City or Town Brentwood County St. Louis  
  1/4     1/4     1/4  , Section \_\_\_\_\_  
Township \_\_\_\_\_ Range \_\_\_\_\_ No. of Acres \_\_\_\_\_

Applicant's Certification

3. I certify that I have personally examined and am familiar with the information in this application and believe that the information submitted is accurate and complete. I am aware that making a false statement, or misrepresentation in this application is grounds for revoking Resource Recovery Facility Certification. I may also be guilty of a misdemeanor and upon conviction, may be punished by fine or imprisonment.

Applicant Signature *[Signature]* Date 7/19/82

4. Land Owner Signature *[Signature]* Date \_\_\_\_\_

Name Robert L. Proest Phone (314) 645-5575

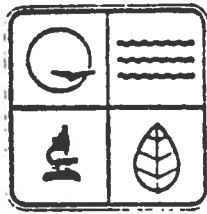
Address 132 Hanley Industrial Court

City St. Louis State Missouri Zip Code 63144

4a. Name: Joseph J. Hatala Phone: (314) 645-5575

Form RRA Address: 132 Hanley Industrial Court

City: St. Louis State: Missouri Zip Code: 63144



# CERTIFIED RESOURCE RECOVERY FACILITY

Certification for resource recovery is issued to:

SILMASCO, INC. d/b/a SILVERMAT SERVICE COMPANY

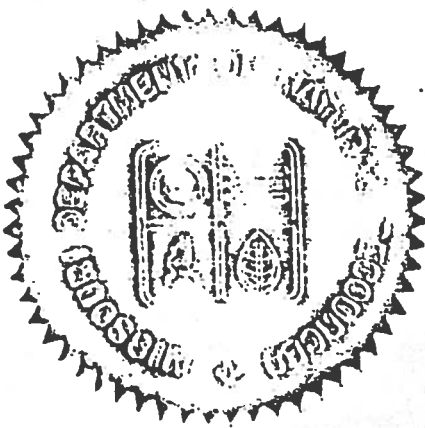
For the facility located: 132 Hanley Industrial Court, St. Louis, MO 63144

CERTIFICATION NUMBER: RR-012

A copy of this certificate must be available at the facility during operation.

- This certification is valid from the date signed for a period of two years, in accordance with the Certified Resource Recovery Facility Application Form approved by the department. Only wastes listed in the approved application are to be processed at this facility.

It is understood that the acceptance and use of this certification subjects the operator of the above named facility to the applicable requirements of the Missouri Hazardous Waste Management Law and the rules thereunder specifically 10 CSR 25-9.010.



September 30, 1982

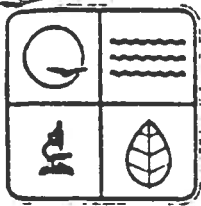
Date

*Fred A. Lafser*

Fred A. Lafser, Director  
Missouri  
Department of Natural Resources

by *David E. Bedan*

David E. Bedan, Director  
Waste Management Program



September 30, 1982

RECEIVED  
SEP 2 1982

SLRO

MDJ

RR-012

Mr. Joseph G. Matthews  
Silvermat Service Company  
132 Hanley Industrial Court  
St. Louis, MO 63144

Dear Mr. Matthews:

This letter is to inform you that the department has completed the review of your certified resource recovery facility application form. After a review of your application form and the supporting documents the department is pleased to inform you that Silmasco, Inc. d/b/a Silvermat Service Company located in St. Louis County has been certified for resource recovery contingent upon the following provisions.

1. The operator shall comply with 10 CSR 25-9.010.
2. The operator shall accept only those wastes listed in the application and in the amounts specified.

If you have any questions regarding compliance with your certification, please contact me at this office.

Sincerely,

Joe Jansen  
Environmental Engineer  
Technical Services Section  
Waste Management Program

JJ/jas

Enclosure

cc: Mr. Bob Stewart, EPA  
St. Louis Regional Office

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P.O. Box 1368  
Jefferson City, Missouri 65102 (314) 751-3241  
1915 Southridge Drive

**PX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)**

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE  


NAME & OFFICIAL TITLE (type or print)

Joseph G. Matthews, President

DATE SIGNED

9/9/80



**INSTRUCTIONS:** If you received a preprinted label, attach it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

FOR OFFICIAL USE ONLY

## COMMENTS

[illegible]

INSTALLATION'S EPA I.D. NUMBER													APPROVED		DATE RECEIVED (yr., mo., & day)					
3													T	A	C					
F	M	0	0	5	6	9	5	8	7	9	6	3	1						8	0
1	2											13	14	15	16		17			

1. NAME OF INSTALLATION

S i l m a s c o   I n c .   d b a   S i l v e r m a t   S e r v i c e   C o

## II. INSTALLATION MAILING ADDRESS

c		STREET OR P.O. BOX																													
3	13	1	3	2		H	a	n	l	e	y		I	n	d	u	s	t	r	i	a	l		C	o	u	r	t			

CITY OR TOWN																		ST.		ZIP CODE						
C																		S	T	Z	I	P	C	O	D	E
4	S	t	L	o	u	i	s	M	i	s	s	o	u	r	i			M	O	6	3	1	4	4		
15	16																40	41	42	43						

### III. LOCATION OF INSTALLATION

c		STREET OR ROUTE NUMBER																				
5	132	H	a	n	l	e	y	I	n	d	u	s	t	r	i	a	l	C	o	u	r	t

CITY OR TOWN																		ST.	ZIP CODE
6	S	t	L	o	u	i	s	M	i	s	s	o	r	i				MO	63144

#### IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)													PHONE NO. (area code & no.)																									
2	M	a	t	t	h	e	w	s	J	o	s	e	p	h	G			P	r	e	s	i	d	e	n	t	3	1	4	-	6	4	5	-	5	5	7	5

## V. OWNERSHIP

[illegible]

**B. TYPE OF OWNERSHIP**  
(enter the appropriate letter into box)

F = FEDERAL M = NON-FEDERAL	M	<input type="checkbox"/> 57 A. GENERATION	<input checked="" type="checkbox"/> 58 B. TRANSPORTATION (complete item VII)
	56	<input checked="" type="checkbox"/> 59 C. TREAT/STORE/DISPOSE	<input type="checkbox"/> D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ 61 A. AIR      ☐ 62 B. RAIL      ☒ 62 C. HIGHWAY      ☐ 64 D. WATER      ☐ E. OTHER (specify):

### VIII. FIRST OR SUBSEQUENT NOTIFICATION

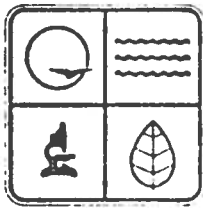
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION ☐ B. SUBSEQUENT NOTIFICATION (complete item C)

[illegible]

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



# CERTIFIED RESOURCE RECOVERY FACILITY

Certification for resource recovery is issued to:

SILMASCO, INC. d/b/a SILVERMAT SERVICE COMPANY

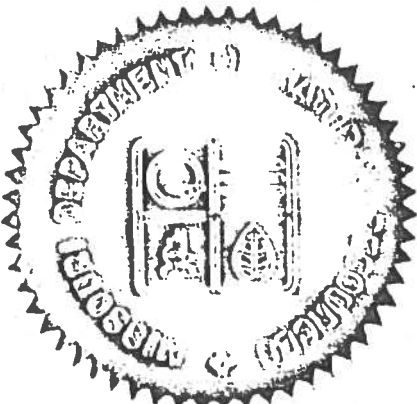
For the facility located: 132 Hanley Industrial Court, St. Louis, MO 63144

CERTIFICATION NUMBER: RR-012

A copy of this certificate must be available at the facility during operation.

This certification is valid from the date signed for a period of two years, in accordance with the Certified Resource Recovery Facility Application Form approved by the department. Only wastes listed in the approved application are to be processed at this facility.

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September 30, 1982

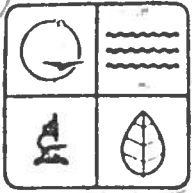
Date

*Fred A. Lafser*

Fred A. Lafser, Director  
Missouri  
Department of Natural Resources

by *David E. Bedan*

David E. Bedan, Director  
Waste Management Program



Silmasco

September 30, 1982

RR-012

MO D 056958 796

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P.O. Box 1368  
Jefferson City, Missouri 65102 (314) 751-3241  
1915 Southridge Drive

Mr. Joseph G. Matthews  
Silvermat Service Company  
132 Hanley Industrial Court  
St. Louis, MO 63144

Dear Mr. Matthews:

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Sincerely,

Joe Jansen  
Environmental Engineer  
Technical Services Section  
Waste Management Program

JJ/jas

Enclosure

cc: Mr. Bob Stewart, EPA ✓  
St. Louis Regional Office

Christopher S. Bond Governor  
Fred A. Lafser Director

Division of Environmental Quality  
Robert J. Schreiber Jr., P.E. Director

P-266 690 652

POSTAGE AND CERTIFIED MAIL

INSURANCE COVERAGE PROVIDED —  
FOR INTERNATIONAL MAIL

Joseph G. Matthews  
Salmonco, Inc.  
132 Hinkley Ind. Ct.  
Arling, MO 63149

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Matthews

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3. If your facility is engaged in the transportation of any of these hazardous wastes in the course of your operating processes, then it is probably correctly identified as a transporter. If the material is transported from your facility by another firm, then your facility is not transporter.

4. If you generate, as a result of your operating processes, one or more of these listed wastes in excess of 100 kg per month but less than 1000 kg/month your facility is a generator by definition under the Missouri State Hazardous Waste Law and Regulations, but is defined as a "small quantity generator" under the Federal RCRA regulations.

5. If you notified us under RCRA because your hazardous waste was identified as "PCB's," you are regulated under the Toxic Substances Control Act (TSCA), and may be exempt from regulation under RCRA.

6. You should have checked block "D", Underground Injection, if an injection well is located at your facility. An injection well is defined as any man-made hole in the ground that is deeper than it is wide and that is used for the subsurface placement of fluid, including septic tanks that have the capacity to serve 20 or more people.

In order to correctly identify your facility's status within the program, it is very important that you consider the above points and respond to us in writing within 15 days of the date of receipt of this letter, providing us with the correct information. The letter should be signed by the person who signed the initial notification, or if that person is no longer employed by the facility, it should be signed by his or her successor and your letter should so state. If we do not hear from you within 15 days, it will be necessary to refer your file to our Compliance staff for additional follow-up.

If you have any questions about this process, please contact Ms. Betti Harris, Missouri Coordinator, who can be reached at 816-374-6534.

Thank you for your cooperation.

Sincerely yours,

Robert L. Morby  
Chief, Waste Management Branch  
Air and Waste Management Division

cc: David Bedan, Director  
Waste Management Program, MDNR

Enclosure

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Joseph G. Matthews, President  
Silmasco, Inc.  
132 Hanley Ind., Court  
St. Louis, Missouri 63144

RE: MOD056958796

Dear Mr. Matthews:

On August 4, 1982, we contacted you for the purpose of providing you the opportunity to correct or confirm the status of your facility in the Federal Resource Conservation and Recovery Act (RCRA) program. We asked you to respond to us in writing within 15 days of receipt of this letter in order to avoid possible compliance action. To date, we have received no response. On the chance that the letter may have not been received, we are sending you this certified mail request to provide one more opportunity to respond before we initiate a compliance referral. It is imperative that you contact us no later than November 30, 1982, so that your facility's status may be accurately described in the RCRA system. In responding, please consider the information which follows.

Our records show that in 1980, you submitted RCRA notification for the above listed facility, and indicated that it was involved in the "treatment, storage and disposal" (TSD) of a hazardous waste as defined in 40 CFR Parts 260-265. However, you did not elect to complete your request for Interim Status under the Act by following that notification with the submittal of a Part A Permit Application. It is no longer possible to receive Interim Status except under selected conditions according to the RCRA regulations, but as a "TSD" facility, you may be subject to the full RCRA permitting regulations unless you advise us to the contrary.

Many persons completed this notification form incorrectly, so for purposes of clarification, you should consider the following in determining your correct status under the regulations:

1. If you treat on site, store on site longer than 90 days, or dispose on site any of the hazardous wastes listed in 40 CFR Part 261, your facility is probably correctly identified as a TSD.
2. If you generate, as a result of operating processes, one or more of these listed wastes in excess of 1000 kg per month (2200 lbs) or 1 kg per month (2.2 lbs) of an acute hazardous waste as listed, and if you do not store these wastes for longer than 90 days, then your facility is probably correctly identified as a generator.

ARWM:WMBR:SPRS:B.HARRIS:jp:x6534:10/19/82

SPRS      SPRS      WMBR  
HARRIS    MCLAUGHLIN    MORBY

*[Handwritten signatures and initials]*  
CWM  
10/24  
with  
10/24/82

RECORD OF  
COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE

☒ OTHER (SPECIFY) *follow-up example*  
(Record of item checked above)

TO: *Chit*

FROM: *hh*

DATE *11/5/82*  
TIME *8:40*

SUBJECT *Almasco Call*

SUMMARY OF COMMUNICATION

- ① No indication in our file that these people ever talked to EPA about anything
- ② DNR inspected + requested corrections
- ③ Co. guided as TSD/Incump. No post A. My contact was routine clean-up of files.

MEMORANDUM  
OF CALL

TO: *Bette Harris*

☒ YOU WERE CALLED BY— ☐ YOU WERE VISITED BY—

*Joe Matthews*  
OF (Organization) *314 645 5575*

☐ PLEASE CALL → PHONE NO. CODE/EXT. ☐ FTS

☐ WILL CALL AGAIN ☐ IS WAITING TO SEE YOU

☐ RETURNED YOUR CALL ☐ WISHES AN APPOINTMENT

CONCLUSIONS, ACTION TAKEN OR REQ

MESSAGE

*Letter on RCRA facility —  
He has been in contact  
with Quella Hounoy  
for over a year — Did not  
think he had a problem.*

INFORMATION COPIES

TO:

RECEIVED BY *Deane Check*

DATE TIME

53-109  
☆ U.S. G.P.O. 1980-311-156/26

STANDARD FORM 63 (Rev. 8-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.6

*that out*